

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In Re: :
:
RONALD PHILLIP FERRY : Case No. 15-11839-KHK
: (Chapter 13)
Debtor :
:

DEBTOR'S RESPONSE TO MOTION TO DISMISS

COMES NOW the debtor and responds to the motion to stop a discharge, filed by Sandra Beard (Docket Item No. 156), as follows:

The debtor's counsel has been unable to reach the debtor by telephone. Of the two numbers on file, one has a voice mailbox not set up and the other always returns a busy signal, and while counsel has written to the debtor, he has not yet responded.

WHEREFORE the debtor prays that this matter be continued for a reasonable time in order to allow him to discuss the motion with his counsel, and for such other relief as may be needed.

RONALD PHILLIP FERRY
By Counsel

/s/ Richard G. Hall
RICHARD G. HALL, Esquire
Counsel for the plaintiff
601 King Street, Suite 301
Alexandria, Virginia 22314
(703) 256-7159
Va Bar No. 18076

Certificate of Service

I hereby certify that on May 7, 2020, I mailed a copy of this response to Sandra Beard, c/o Jeffery Vogelmann, 201 N. Union Street, Suite 110, Alexandria, Virginia 22314.

/s/ Richard G. Hall